

AMENDMENTS TO THE DRAWINGS:

Applicants have submitted red-marked drawings, which label groove 63. The drawings are submitted herewith. Formal drawings will be submitted upon notice of allowance.

REMARKS

The Office Action dated October 19, 2005 presents the examination of claims 1-3. Claims 1-3 have been amended. New claims 4-10 have been added. Support for the recitation of "an axial groove extending along an axis of one of said opposing distal ends of said feeding horizontal shaft" is found in the specification, such as page 6, line 20 to page 7, line 2 and FIGS. 3-6. All other changes are minor and supported by the specification. Upon entry of this Reply, claims 1-10 will be pending. No new matter is inserted into the claims.

Applicants have also submitted red-marked drawings. The drawings have been amended to add a label for groove 63. Support for groove 63 can be found in paragraph 24. No new matter is inserted into the drawings. Formal drawings will be submitted upon notice of allowance.

Rejection under 35 U.S.C. § 103(a) of Claims 1-3 over Cukelj in view of Purves

The Examiner rejects claims 1-3 under 35 U.S.C. § 103(a) for allegedly being obvious over Cukelj in view of Purves. Applicant respectfully traverses the rejection applied to the pending claims in light of the amendments. Reconsideration of the claims and withdrawal of the instant rejection are respectfully requested.

As discussed throughout the specification, it is one important aspect of the present invention is reflected in a drilling device that permits both left and right-handed operation. This operation is achieved in part by an axial groove that is formed at a distal end of the feeding horizontal shaft. This groove serves to accommodate a linking element, which engages either the left or right hub, thereby permitting rotation of the engaged hub and feeding horizontal shaft when the handle is rotated.

Regarding claims 1-3, the combination of Cukelj and Purves does not disclose an axial groove extending along an axis of the distal end of the feeding horizontal shaft, as is explicitly recited in independent claims 1, 4, and 9. While Cukelj does disclose a

rectangular key 94 disposed in the keyways 88, 90, and 92 to prevent relative rotational movement between the pinion shaft 16 and the rotational member 24 (col. 5, ll. 25-29), the axial groove of the present invention is utilized to facilitate movement of the feeding horizontal shaft and is provided with superior stability and strength by extending along an axis of the distal end of the feeding horizontal shaft rather than on the edge of one end of the pinion shaft as in Cukelj.

To establish a *prima facie* case of obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. (See MPEP 2143.03). Cukelj fails to teach or suggest that the feeding horizontal shaft has a toothed portion for driving the drilling chuck downward as recited in claim 2. Combining Purves with Cukelj does not remedy this failure since there is no suggestion to combine. Therefore, a *prima facie* case of obviousness has not been established, and withdrawal of the instant rejection is respectfully requested.

In addition, new independent claims 4, from which claims 5-8 depend, and 9, from which claim 10 depends, also recite an axial groove. New claims 7 and 9 recite a toothed portion. As shown above, the combination of Cukelj with Purves does not suggest or teach these two limitations, and new claims 4-10 should be allowed.

Rejection under 35 U.S.C. § 103(a) of Claims 1-3 over Cukelj in view of Henkel

The Examiner rejects claims 1-3 under 35 U.S.C. § 103(a) for allegedly being obvious over Cukelj in view of Henkel. Applicant respectfully traverses the rejection applied to the pending claims. Reconsideration of the claims and withdrawal of the instant rejection are respectfully requested.

The combination of Cukelj and Henkel does not disclose an axial groove extending along an axis of the distal end of the feeding horizontal shaft, as is explicitly recited in independent claims 1, 4, and 9. While Cukelj does disclose a rectangular key 94 disposed in the keyways 88, 90, and 92 to prevent relative rotational movement between the pinion shaft 16 and the rotational member 24 (col. 5, ll. 25-29), the axial

horizontal shaft and is provided with superior stability and strength by extending along an axis of the distal end of the feeding horizontal shaft rather than on the edge of one end of the pinion shaft as in Cukelj. Since all of the claim limitations are not taught or suggested by Cukelj in view of Henkel, withdrawal of the instant rejection is respectfully requested.

To establish a *prima facie* case of obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. (See MPEP 2143.03).

Cukelj fails to teach or suggest that the feeding horizontal shaft has a toothed portion for driving the drilling chuck downward as recited in claim 2. Combining Henkel with Cukelj does not remedy this failure since there is no suggestion to combine. Therefore, a *prima facie* case of obviousness has not been established, and withdrawal of the instant rejection is respectfully requested.

In addition, new independent claims 4, from which claims 5-8 depend, and 9, from which claim 10 depends, also recite an axial groove. New claims 7 and 9 recite a toothed portion. As shown above, the combination of Cukelj with Henkel does not suggest or teach these two limitations, and new claims 4-10 should be allowed.

Conclusion

As Applicant has traversed each and every rejection raised by the Examiner, it is hereby respectfully requested that Examiner withdraw the rejections of claims 1-3 and pass claims 1-10 to issue.

No fees are considered to be due; however, if it is determined that payment of a fee is required, please charge our Deposit Account No. 13-0235.

Do not hesitate to call Applicants' attorneys at the number below if they may help expedite the prosecution of this application in any way.

Respectfully submitted,

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